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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
f/k/a/ GENERAL MOTORS CORP., <i>et</i>	:	
<i>al.</i> ,	:	Jointly Administered
	:	
Debtors.	:	
	:	
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**NOTICE OF LODGING OF PROPOSED STIPULATION AND AGREED
ORDER BETWEEN THE GUC TRUST AND THE UNITED STATES OF AMERICA**

The United States of America hereby lodges with the Court the proposed Stipulation and Agreed Order between the GUC Trust and the United States of America (the “Stipulation and Proposed Order”) attached hereto as Exhibit 1. The Stipulation and Proposed Order has been executed by all parties.

The United States requests that the Court not approve the Stipulation and Proposed Order at this time, but will request that the Court approve it simultaneously with the proposed Lower Ley Creek Settlement Agreement that was also lodged today if, after the public comment period, the United States determines that it is appropriate to seek entry of that Settlement Agreement.

Dated: New York, New York
April 30, 2012

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for the United States of America

By: /s/ Natalie N. Kuehler
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